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*ATTORNEYS FOR DEFENDANTS*

*CANON INC. AND CANON U.S.A., INC.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

TECHNOLOGY PROPERTIES LIMITED  
LLC and MCM PORTFOLIO LLC,

Plaintiffs,

v.

CANON INC., et al.,

Defendants.

Civil Action No. 14-03640 CW

TECHNOLOGY PROPERTIES LIMITED  
LLC and MCM PORTFOLIO LLC,

Plaintiffs,

v.

FALCON NORTHWEST COMPUTER  
SYSTEMS, INC.,

Defendant.

Civil Action No. 14-03641 CW

LEE DECLARATION ISO DEFENDANTS'  
CLAIM CONSTRUCTION BRIEF  
Civil Action No. 14-03640 CW



1 TECHNOLOGY PROPERTIES LIMITED  
2 LLC and MCM PORTFOLIO LLC,  
3 Plaintiffs,  
4 v.  
5 HEWLETT-PACKARD COMPANY,  
6 Defendant.

Civil Action No. 14-03643 CW

6 TECHNOLOGY PROPERTIES LIMITED  
7 LLC and MCM PORTFOLIO LLC,  
8 Plaintiffs,  
9 v.  
10 NEWEGG INC., et al.,  
11 Defendants.

Civil Action No. 14-03645 CW

10 TECHNOLOGY PROPERTIES LIMITED  
11 LLC and MCM PORTFOLIO LLC,  
12 Plaintiffs,  
13 v.  
14 SEIKO EPSON CORPORATION., et al.,  
15 Defendants.

Civil Action No. 14-03646 CW

14 TECHNOLOGY PROPERTIES LIMITED  
15 LLC and MCM PORTFOLIO LLC,  
16 Plaintiffs,  
17 v.  
18 SHUTTLE INC., et al.,  
19 Defendants.

Civil Action No. 14-03647 CW

18 **DECLARATION OF JACQUELINE K. S. LEE IN SUPPORT**  
19 **OF DEFENDANTS' CLAIM CONSTRUCTION BRIEF**

20 I, Jacqueline K. S. Lee, hereby declare as follows:

21 1. I am an attorney with the law firm of Jones Day, counsel of record for Defendants  
22 Canon Inc. and Canon, U.S.A., Inc.

23 2. Attached hereto as Exhibit 1 is a true and correct copy of U.S. Patent No.  
24 6,402,558.

25 3. Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent No.  
26 7,295,443.

27 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the  
28 prosecution history of U.S. Patent No. 7,295,443.

LEE DECLARATION ISO DEFENDANTS'  
CLAIM CONSTRUCTION BRIEF  
Civil Action No. 14-03640 CW



5. Attached hereto as Exhibit 4 is a true and correct copy of the public version of the Commission Opinion in ITC Inv. No. 337-TA-841, dated January 9, 2014.

6. Attached hereto as Exhibit 5 is a true and correct copy of U.S. Patent No. 7,522,424.

7. Attached hereto as Exhibit 6 is a true and correct copy of U.S. Patent No. 7,719,847.

8. Attached hereto as Exhibit 7 is a true and correct copy of Order No. 44 in ITC Inv. No. 337-TA-807, dated August 2, 2012.

9. Attached hereto as Exhibit 8 is a true and correct copy of U.S. Patent No. 6,438,638.

10. Attached hereto as Exhibit 9 is a true and correct copy of Order No. 23 in ITC Inv. No. 337-TA-841, dated October 4, 2012.

11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the prosecution history of U.S. Patent No. 7,719,847.

12. Attached hereto as Exhibit 11 is a true and correct copy of an excerpt from TPL's Post-Hearing Reply Brief in ITC Inv. No. 337-TA-841. Defendants have confirmed with TPL that this excerpt does not contain confidential information.

13. Attached hereto as Exhibit 12 is a true and correct copy of U.S. Patent No. 5,675,628.

14. Attached hereto as Exhibit 13 is a true and correct copy of U.S. Patent No. 5,748,720.

15. Attached hereto as Exhibit 14 is a true and correct copy of U.S. Patent No. 5,815,426.

16. Attached hereto as Exhibit 15 is a true and correct copy of Global System for Mobile Communications ("GSM") 02.17 V8.0.0 (1999-11) Technical Specification.

17. Attached hereto as Exhibit 16 is a true and correct copy of Klaus Vedder & Franz Weikmann, Smart Cards – Requirements, Properties, and Applications, in STATE OF THE ART IN APPLIED CRYPTOGRAPHY 307-331, 308, 322 (1998).

LEE DECLARATION ISO DEFENDANTS'  
CLAIM CONSTRUCTION BRIEF  
Civil Action No. 14-03640 CW



1           18.     Attached hereto as Exhibit 17 is a true and correct copy of Urien, P., Internet Card,  
2 a Smart Card as a True Internet Node, in COMPUTER COMMUNICATIONS 23, 1655-66, 1656  
3 (2000).

4           19.     Attached hereto as Exhibit 18 is a true and correct copy of the Declaration of Dr.  
5 Gary S. Tjaden in Response to the August 12, 2012 Declaration of Dale E. Buscaino ("Tjaden  
6 Decl.").

7           I declare under penalty of perjury under the laws of the United States of America that the  
8 foregoing is true and correct.

9  
10          Dated:   April 23, 2015

*/s/ Jacqueline K. S. Lee*

\_\_\_\_\_  
Jacqueline K. S. Lee



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served on all counsel of record for all parties of record on April 23, 2015 via the Court's CM/ECF system.

/s/ Gordon M. Fauth, Jr.